

SECTION SIX

Waste Reduction Checklists: A Preliminary Environmental Assessment

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In this section a series of short questionnaires are provided as a guide to small business counselors or agents. Their purpose is to help the client determine if there is a potential need for seeking help from non-regulatory assistance programs such as the Solid and Hazardous Waste Education Center, the Small Business Clean Air Assistance Program, or state regulatory agencies.

Each questionnaire has questions designed to help the counselor determine the potential needs of the client. The questions are not intended to be comprehensive with respect to the full range of regulated activity in any category of waste generation. Any response that matches the answers marked with an asterisk are candidates for seeking additional assistance or information on behalf of the client.

Sources:

The Environmental Self-Audit for Small Businesses: A Quick and Easy Guide to Environmental Compliance, New York State Department of Environmental Conservation and Department of Economic Development, January 1994.
Waste Reduction Assessment and Technology Transfer (WRATT) Training Manual, 2nd ed., University of Tennessee for Industrial Services, 1989.

6.1 Land Use Checklist

Land use is an important consideration in terms of any practices on or proposed on the land or site of the business. Concerns extend from previous land owners or property occupants that may have engaged in practices that compromised or contaminated the site. Any answer corresponding to those marked with an asterisk may require additional discussion with the client.

- 1) Has the business investigated whether its operations comply with regulations that affect the land or geographic location of the business?

Yes _____ No _____*

- 2) Has the business location ever been used by another business that may have caused some contamination of the property? Points to consider are materials storage, on-site manufacturing, electrical transformers, fuel storage, asbestos use, on-site disposal, ponds, and lagoons.

Yes _____* No _____ Don't Know _____*

- 3) Does the business have plans for any site expansion or developments that may require permits.

Yes _____* No _____

- 4) Are there any unused bulk storage tanks such as for fuels or chemicals, either above ground or below ground, and

Yes _____* No _____ Don't Know _____*

have they been properly cleaned, filled, or removed?

Yes _____ No _____*

- 5) Has the property been subject to soil testing or site inspections?

Yes _____ No _____* Don't Know _____*

- 6) Have fuel storage tanks in use been properly registered?

Yes _____ No _____* Don't Know _____*

- 7) Does the business dispose of any materials on the property?

Yes _____* No _____

6.2 Air Quality Checklist

Many different types of businesses are subject to Clean Air Act requirements. In some areas, air pollution rules are more strict if there is an existing problem such as ozone “non-attainment” along the Lake Michigan corridor of Wisconsin. Manufacturers, auto body shops, dry cleaners, printers, and others who have some form of air emissions may be affected by air regulations.

In this section, any response that corresponds to answers marked with an asterisk should be looked at carefully. Additional questions may be asked, and notes should be taken on areas where concerns exist.

- 1) Has the business investigated whether it is in compliance with state and local regulations on clean air?

Yes _____ No _____*

- 2) Have air emissions been identified, measured, and documented?

Yes _____ No _____*

- 3) For fugitive emissions, does the business have a current site map or blueprint identifying sources?

Yes _____ No _____*

- 4) If the business has smoke stacks have they been inspected and permits issued?

Yes _____ No _____*

- 5) If any waste materials burned on site for energy, have permits been obtained?

Yes _____ No _____*

- 6) If any facility expansion or modification is planned that may be an additional source of air emissions, have the necessary permits been obtained before construction?

Yes _____ No _____*

- 7) Does the business keep records of its raw materials so that data can be generated on potential fugitive emissions?

Yes _____ No _____*

8) Has the business ever receive complaints from neighbors about odors or emissions from the facility?

Yes _____* No _____

9) Has the business implemented any program or project designed to reduce the generation or release of air emissions?

Yes _____ No _____*

10) Does the business use any of the following materials or processes?

- combustion of fuel oil, coal, or waste _____
- chemical processing _____
- cleaning with solvents _____
- painting or coatings _____
- trash incineration _____
- storage of organic liquids _____
- dry cleaning _____
- printing and graphic arts _____
- wood finishings _____
- chemical wood pulping _____
- use of adhesives _____
- wood furniture manufacturing _____
- electroplating _____

* for any line checked

6.3 Water Quality Checklist

Water quality is a priority for the state of Wisconsin. Groundwater is the primary source of drinking water for most areas of the state, and surface waters are important for Wisconsin's vast recreational industry in addition to many other areas. Businesses may use public sewer systems for wastewater or may discharge directly to surface waters in some cases. There is also the potential for accidental spills. Any of these avenues of release is a potential source of environmental contaminants that may be regulated and could result in liabilities for a business.

Any response to questions marked with an asterisk should be looked at carefully. Additional information may be needed to assist businesses in properly addressing these issues.

- 1) Has the business investigated whether it complies with or is subject to local, state, and federal regulations on wastewater discharges?

Yes _____ No _____ *

- 2) If there are wastewater discharges, have the discharges been analyzed, quantified, and documented?

Yes _____ No _____ *

- 3) If there are wastewater discharges to the municipal wastewater treatment facility, are the discharges in compliance with all pre-treatment requirements or discharge limits?

Yes _____ No _____ * Don't Know _____ *

- 4) If there is any direct discharge of wastewater into groundwater or to the surface such as a stream, lake or drainage ditch, does the business have a permit to do so?

Yes _____ No _____ *

- 5) Does the business have floor drains that go directly to the sewer?

Yes _____ * No _____ Don't Know _____ *

- 6) Does the business regularly monitor its discharges and keep track materials used in the facility?

Yes _____ No _____ *

- 7) If the business has industrial activity exposed to storm water, does it have a permit to discharge the storm water?

Yes _____ No _____ *

8) If there are plans to modify a facility that has a permit for wastewater discharges, have the regulatory agencies been notified of those plans?

Yes _____ No _____ *

6.4 Solid Waste Checklist

Wisconsin's Waste Reduction and Recycling Law established that a variety of materials (see Section 5.2) be banned from landfill disposal and that recycling programs be implemented. Business are subject to meeting the local recycling ordinances which may vary in specific details, but which have certain minimum standards throughout the state. Businesses that may not know the specific requirements they must meet can get information from their local solid waste management office or recycling coordinator.

Businesses that own their buildings or owners of the buildings that businesses occupy, including commercial, industrial and retail, must provide access to recycling collection and storage on site or the transportation of recyclables to a processing facility. Businesses which respond to answers below marked with an asterisk may need additional information or assistance.

1) Does the business recycle materials as required by local ordinance and state law?

Yes _____ No _____ * Don't Know _____ *

2) Does the business generate any large amount of waste material that has been difficult to recycle or that creates a substantial waste cost?

Yes _____ * No _____

3) Does the business dispose of any wastes on its property or store solid waste on-site for an indefinite period of time?

Yes _____ * No _____

If "yes", does the business have a permit for such activity?

Yes _____ No _____ *

4) Does the business generate oil and other vehicle wastes that may not be considered hazardous waste?

Yes _____ * No _____

5) Are wastes generally segregated for recycling and disposal?

Yes _____ No _____ * Don't Know _____ *

6) Does the business burn solid waste at its site or facility?

Yes _____ * No _____

6.5 Hazardous Waste Checklist

The regulations covering the management of hazardous wastes in Wisconsin follow the federal regulations established under the Resource Conservation and Recovery Act (RCRA). Most businesses that generate hazardous waste fall in the conditionally exempt category of “very small quantity generator”, which has limited requirements including proper disposal of the waste (see Section 5.3). It is the responsibility of the business to determine if it is generating any hazardous waste and to determine how much.

The questions provided below are intended to help determine if the business has a sufficient understanding of its generator status when hazardous materials are present in the facility. Answers with an asterisk indicate the potential need for additional assistance.

- 1) Has the business conducted hazardous determinations for all potentially hazardous waste streams?

Yes _____ No _____ * Don't Know _____ *

- 2) Are regulated hazardous wastes generated from the business properly hauled and disposed, or treated by certified operators who meet state and federal requirements?

Yes _____ No _____ * Don't Know _____ *

- 3) Are hazardous wastes properly segregated from other wastes, including other hazardous wastes and solid waste or non-hazardous liquid waste?

Yes _____ No _____ * Don't Know _____ *

- 4) Are hazardous wastes properly stored, including appropriate fire and explosion isolation and ventilation for volatile materials?

Yes _____ No _____ * Don't Know _____ *

- 5) Are all wastes properly dated and labeled?

Yes _____ No _____ * Don't Know _____ *

- 6) Does the business have clearly defined procedures for preventing spills and leaks, and for dealing with any spill or leak that does occur?

Yes _____ No _____ * Don't Know _____ *

7) Does the business know how much hazardous waste it generates and stores by month and by year?

Yes _____ No _____ *

8) Does that business know its generator status, and does the business know whether it has any reporting obligations to the Wisconsin Department of Natural Resources?

Yes _____ No _____ *

9) Does the business know whether it needs an EPA identification number?

Yes _____ No _____ *

6.6 Hazardous Materials and Worker Safety Checklist

Hazardous materials are often used as ingredients in processes or as materials in manufacturing. They may be used in a wide range of items, from cleaning agents to product constituents. Hazardous materials are chemicals that are reactive, corrosive, ignitable, or toxic.

Reactive means that the material, sodium or potassium metal for example, undergoes a violent reaction with water. Corrosive implies a material has a strong acid property such as car battery acid, or a strong alkaline or base property such as lye used in drain cleaners. Strong acids and bases can both cause strong tissue damage when in direct contact with the skin. Ignitable materials such as gasoline, and many cleaning or painting solvents catch fire very easily. A material with a flash point of less than 140° Fahrenheit. Toxic materials can be poisonous, noxious, or venomous and may consist of fumes, liquids, or solids. Examples include methyl alcohol vapors, liquid pesticides, mercury, and lead.

The following questions provide a brief look at some of the issues that a small business may face. Any answers corresponding to those marked with an asterisk indicate that additional assistance for the business may be needed.

- 1) Does the business maintain a complete file of Material Safety Data Sheets (MSDS) for all hazardous materials on site, and are the MSDS sheets available at a convenient location for employees?

Yes _____ No _____ * Don't Know _____ *

- 2) Has an inventory been conducted and maintained for all hazardous materials in use or produced on site?

Yes _____ No _____ *

- 3) Does your business have or need a hazardous Communication Standards Program?

Yes _____ No _____ * Don't Know _____ *

- 4) Does the business maintain effective education and training programs on safety and chemicals hazards, including adequate follow up on enforcement of rules?

Yes _____ No _____ *

- 5) Do employees know proper procedures for handling and managing hazardous materials, including procedures for spill response and emergency cleanup ?

Yes _____ No _____ *

6) Are containers with hazardous materials labeled with proper warnings, and are containers kept closed or secured in proper storage facilities?

Yes _____ No _____ *

7) Does the storage of hazardous chemicals in the business comply with National Fire Protection and local ordinances?

Yes _____ No _____ * Don't Know _____ *

8) Are hazardous materials ordered on an as needed basis rather than stockpiling larger quantities?

Yes _____ No _____ *